## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

FIRST BANK OF PUERTO RICO

Plaintiff

VS.

ROSTA FAMILY LIMITED PARTNERSHIP ET AL.

**Defendants** 

CIVIL NO. 16-1816 (DRD) LEAD CASE CONSOLIDATED TO 16:1816

Civil No. 15-1683 (PAD) Civil No. 15-1684 (FAB)

Civil No. 15-1685

## MOTION TO REQUEST EXTENSION OF TIME TO SUBMIT REPLY TO PLAINTIFF'S MOTION FOR ENTRY OF JUDGEMENT

## TO THE HONORABLE COURT:

COMES NOW, ROSTA FAMILY LIMITED, et als., through the undersigned attorney and very respectfully states and prays as follows:

On December 14, 2017, Banco Popular of Puerto Rico ("BPPR") filed an Motion Requesting Entry of Judgement. See Docket 162.

Plaintiff's Motion is based on the opinion and order issued on September 14, 2017, granting Plaintiff's Summary Judgment in case N3Cl201400650. See Docket 141.

It is well known, that on September 19, 2017 Puerto Rico was struck by Hurricane Maria. The aftermath of Hurricane Maria devastated the island's power and communications. At present, the undersigned counsel recently obtained electricity at his office. Nevertheless, the irregular fluctuation of electricity has damage our server and we are in the process to replace and download all saved data into it, but it has taken longer that expected.

Thus, we respectfully request a five (5) day extension term to expire on

Tuesday, January 6, 2018, to file our reply the Plaintiffs' motion..

RESPECTFULLY SUBMITTED, in Caguas, Puerto Rico this 27<sup>th</sup> day of December,

2017.

IT IS HEREBY CERTIFIED that on this same date I have filed the foregoing with

the Clerk of the court using the CM/ECF system, which will send notification of

such filing to the CM/ECF participants in this case.

VELAZQUEZ & SANTIAGO LLC PO Box 1450, Caguas PR 00726

Tel: (787) 703-2160; Fax: (787) 703-4004

s/ Carlos A. Velázquez Ramírez CARLOS A. VELÁZQUEZ RAMÍREZ USDCPR216909